Amendments to the Drawings:

None

REMARKS/ARGUMENTS

Claims 1, 2, 4-7, 9-12 and 14-16 stand rejected under 35 U.S.C. 102(a) as being unpatentable over Chang.

Claim 1 comprises the limitations of adjusting a lens aberration of one or more lens aberrations of an initial lens; determining a wafer response to the adjustment; generating lens aberration data according to the wafer response; selecting one or more aberration functions of a plurality of aberration functions; fitting the one or more aberration functions to the lens aberration data; and generating an optical model in accordance to the one or more aberration functions, the optical model indicating the wafer response to the one or more lens aberrations of the initial lens. The examiner is reminded that for a rejection under 35 U.S.C. 102(a) to be valid, each and every element of the claimed invention must described or taught in the cited reference.

Claim 1 comprises the limitation of adjusting the lens aberrations and determining the wafer response to the adjustment. In forming the rejection to claim 1, the examiner writes, "[N]otice that (1) a stepper process is determined based on a wafer response to the adjustment of lens aberration (2) lens aberration information (lens aberration data) is generated according to the wafer response." Applicants have carefully examiner the cited reference and can find no teaching of the above statement. With reference to Figure 4 of the cited reference, the reference teaches inputting lens aberration information 401 into a computer 402. An optical model generator 403 can then be used to generate a set of optical models 405 based on lens aberration information. The reference is silent on how the lens aberration information is obtained. The limitation of the limitation of adjusting the lens aberrations and determining the wafer response to the adjustment is not found in the cited reference.

Claim 1 further comprises the limitation of selecting one or more aberration functions of a plurality of aberration functions; fitting the one or more aberration functions to the lens aberration data; and generating an optical model in accordance to

the one or more aberration functions. The cited reference is silent on how a particular optical model is obtained. Contrary to the examiners statements, the cited reference is silent on fitting one or more aberration functions to the lens aberration data to generate an optical model. The above described limitations of claim 1 are therefore not found in the cited reference.

The limitations of claim 1 are not found in the cited reference and claim 1 is allowable over the cited reference under 35 U.S.C. 102(a). If the examiner insists that the limitations of claim 1 are described or taught in the cited reference, the examiner is requested to specifically point to those Figures and lines in the reference that describe or teach the limitations of claim 1.

Claims 2-5 depend on claim 1 and therefore contain all the limitations of claim 1. claims 2-5 are therefore also allowable over the cited art.

Claim 6 to a system for generating an optical model comprises similar limitations to those of claim 1 and is allowable over the cited art for the reasons stated above. If the examiner insists that the limitations of claim 6 are described or taught in the cited reference, the examiner is requested to specifically point to those Figures and lines in the reference that describe or teach the limitations of claim 6. Claims 7-10 depend on claim 6 and therefore contain all the limitations of claim 6. Claims 7-10 are therefore also allowable over the cited art.

Claims 11 and 16 comprise similar limitations to those of claim 6 and are allowable over the cited art for the reasons stated above. Claims 12-15 and 17 depend on claims 11 and 16 respectively and therefore contain all the limitations of claims 11 and 16. Claims 12-15 and 17 are therefore also allowable over the cited art.

Applicants appreciate the indication that claims 3, 8 and 13, if rewritten in independent form including all of the limitations of the base claim and any intervening claims, would be allowable.

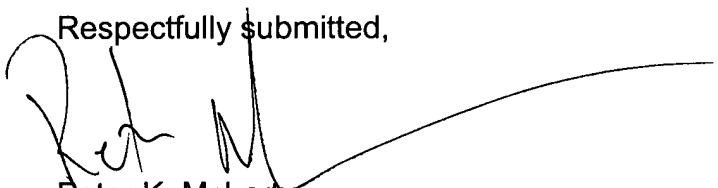
Applicants acknowledge with appreciation that claim 17 is allowed.

In light of the above, it is respectfully submitted that the present application is in condition for allowance, and notice to that effect is respectfully requested.

While it is believed that the instant response places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner contact the undersigned in order to expeditiously resolve any outstanding issues.

To the extent necessary, Applicants petition for an Extension of Time under 37 CFR 1.136. Please charge any fees in connection with the filing of this paper, including extension of time fees, to the deposit account of Texas Instruments Incorporated, Account No. 20-0668.

Respectfully submitted,



Peter K. McLarty
Attorney for Applicants
Reg. No. 44,923

Texas Instruments Incorporated
P.O. Box 655474, MS 3999
Dallas, TX 75265
(972) 917-4258